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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,) CASE NO. 4:23-CR-00267 JSW
Plaintiff,)
v.) JOINT STATUS REPORT AND STIPULATION TO
TIMOTHY ALLEN MANLY WILLIAMS,) CONTINUE STATUS CONFERENCE;
Defendant.) ~~[PROPOSED]~~ ORDER
UNITED STATES OF AMERICA,)
Plaintiff,) CASE NOS. 4:23-CR-00268 JSW-1
v.) 4:24-CR-00502 JSW
DANIEL JAMES HARRIS,)
Defendant.)
)

STIPULATION AND ~~PROPOSED~~ ORDER

UNITED STATES OF AMERICA,) CASE NO. 4:23-CR-00269 JSW-2
)
Plaintiff,) JOINT STATUS REPORT AND STIPULATION TO
) CONTINUE STATUS CONFERENCE;
) ~~[PROPOSED]~~ ORDER
)
v.)
)
ERIC ALLEN ROMBOUGH,)
)
Defendant.)

Each of the above-captioned cases are set for status conference hearings on August 19, 2025.

9 Defendant Timothy Allen Manly Williams pleaded guilty to destruction, alteration, and
10 falsification of records in federal investigations; obstruction of official proceedings; and deprivation of
11 rights under color of law on November 28, 2023. Defendant Manly Williams testified in *United States*
12 *v. Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025.

13 Defendant Daniel James Harris pleaded guilty to conspiracy to distribute anabolic steroids;
14 possession of anabolic steroids with the intent to distribute; and attempted possession of anabolic
15 steroids with the intent to distribute in case number 23-CR-00268; and pleaded guilty to bank fraud in
16 case number 24-CR-00502; on September 17, 2024. Defendant Harris testified in *United States v.*
17 *Devon Wenger*, Case No. 23-CR-268 JSW-2 in April 2025.

18 Defendant Eric Allen Rombough pleaded guilty to conspiracy against rights and deprivation of
19 rights under color of law on January 14, 2025. Defendant Rombough testified in *United States v.*
20 *Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025.

21 Since the setting of the August 19, 2025 status conference hearings, the retrial in *United States v.*
22 *Devon Wenger*, Case No. 23-CR-269 JSW-3 has been continued to September 8, 2025. Accordingly,
23 the parties in the above-captioned cases are not yet ready to set sentencing hearings and the parties
24 stipulate and agree that, with the Court's permission, the currently-scheduled status conference hearings
25 be continued to October 7, 2025 for further status on sentencing.

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STIPULATION AND ~~PROPOSED~~ ORDER

1 The undersigned Assistant United States Attorney certifies that he has obtained approval from
2 the undersigned to file this stipulation and proposed order.

3 **IT IS SO STIPULATED.**

4 DATED: July 29, 2025

/s/ Eric Cheng
5 ERIC CHENG
ALETHEA SARGENT
ALEXANDRA SHEPARD
6 Assistant United States Attorneys

*/s/ *via email 7/29/25*
7 RANDY SUE POLLOCK
Counsel for Defendant TIMOTHY ALLEN
MANLY WILLIAMS

*/s/ *via email 7/29/25*
11 JAMES P. VAUGHNS
12 Counsel for Defendant DANIEL JAMES HARRIS

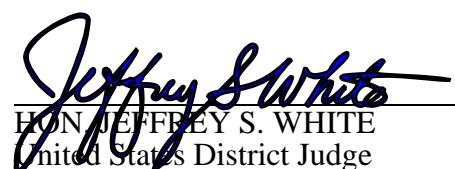
*/s/ *via email 7/29/25*
14 ANTHONY BRASS
15 Counsel for Defendant ERIC ALLEN
16 ROMBOOUGH

1 **[PROPOSED] ORDER**

2 Based upon the facts and representations set forth in the stipulation of the parties, and good cause
3 shown, IT IS HEREBY ORDERED that the status conference hearings currently set for August 19, 2025
4 in each of the above-captioned matters be continued to **October 7, 2025, at 1:00 p.m.** for further status
5 on sentencing. The parties shall file updated joint status reports, or stipulations to request to continue
6 the status conference hearings, by September 30, 2025.

7 **IT IS SO ORDERED.**

8
9 DATED: July 29, 2025

10 
11 HON. JEFFREY S. WHITE
12 United States District Judge